

# EXHIBIT 2

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PRO FOOTBALL | ROUNDUP

# Former N.F.L. Players Face Deadline to Opt Out of Concussion Settlement

By KEN BELSON and BILL PENNINGTON OCT. 14, 2014

N.F.L. players had until midnight Tuesday to declare whether they would opt out of the proposed settlement between the N.F.L. and about 5,000 former players who said the league had hid the dangers of concussions from them.

Retired players, not only those who sued the league, had to notify the court that they would not accept the terms of the settlement and preserve their right to continue fighting the N.F.L. in court.

Several groups of retired players have failed to persuade United States District Judge Anita B. Brody to modify the proposed settlement, which offers up to \$5 million for retired players with severe neurological conditions.

The judge said that players with concerns about the settlement could voice them at a fairness hearing scheduled for Nov. 19 in Philadelphia.

The judge may decide to ask the league and plaintiffs' lawyers to rework the settlement if an unusually high number of players opt out of the settlement or if they make particularly persuasive arguments at the hearing.

There is no precise percentage of opt-outs needed to persuade a judge to force the sides back to the negotiating table.

A court administrator will divulge the number of players who have opted out by Nov. 3.

Some players, and the family of Junior Seau, who committed suicide, have already said they would opt out of the settlement. But in a recent court filing, lawyers said only a handful of players had thus far opted out.

The odds of winning a second legal challenge can be slim. Fred Dryer and several other N.F.L. retirees opted out of a settlement between the league and players who wanted to be compensated for the use of their images. Dryer's second case against the league was denied last week.

Critics of the current settlement contend that it does not cover enough illnesses and that players receive less money if they were in the league for fewer years even though a devastating concussion could occur at any time in one's career.

If Brody approves the settlement, with or without any significant changes, players who have not accepted the deal can still appeal. No cash awards would be paid until all appeals were exhausted.

**GIANTS SIGN OGLETREE** The Giants signed the veteran wide receiver Kevin Ogletree as a free agent and placed cornerback Trumaine McBride and receiver Victor Cruz on injured reserve. Cruz tore the patellar tendon in his right knee in Sunday's loss to the Eagles and McBride, who had been the team's nickel cornerback, broke his thumb in the game.

Ogletree, 27, has played six seasons in the N.F.L., most notably with the Cowboys. He has 78 career receptions for 999 receiving yards and 6 touchdowns. He was often a thorn in the side of his new team when he was a Cowboy, catching 18 passes for 143 yards and 2 touchdowns against the Giants. Last season, Ogletree was with the Tampa Bay Buccaneers and the Detroit Lions. He was expected to be Detroit's third receiver this season, but did not play in the first two regular-season games and was released Sept. 20.

The Giants also added the free-agent cornerback Chandler Fenner, who has periodically been on the team's practice squad. He was released by the team on Oct. 5. **BILL PENNINGTON**

**MORE TIME IN LOS ANGELES** The Los Angeles City Council on Tuesday gave the developer A.E.G. another six months to lure an N.F.L.

team to the nation's second-largest city.

Without discussion, the council extended A.E.G.'s 2012 agreement. The original deal was set to expire on Saturday, but the new deadline to obtain a team commitment is April. **(AP)**

**DOLPHINS LINEMAN REINSTATED** The Miami reserve defensive lineman Derrick Shelby was reinstated from his suspension, which came after he was arrested on misdemeanor charges of resisting arrest and trespassing at a nightclub. He had been suspended eight days without pay. **(AP)**

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